



PRIME SEAFOOD

"Sustainable Seafood for our Best Restaurants"

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October 29, 2015

Dr. Christopher Mallery, Chief
Regulatory Branch, New York District
U.S. Army Corps of Engineers
26 Federal Plaza
New York, NY 10278

Re: Public Notice NAN-1998-00290 (10/5/15) for Hudson River "Pier 54"/Pier 55 Project

Dear Dr. Mallery:

I am the owner of Prime Seafood (www.PrimeSeafood.com) of Kensington, Maryland, the only supplier of solely sustainably managed fish and shellfish to many of Washington DC's top restaurants. As a fisheries biologist with over 35 years of federal fishery conservation and management experience both nationally and internationally, with 20 years of experience in the headquarters of the National Marine Fisheries Service, I am asking you to please stand up for America's ocean fish and millions of American fishermen - both commercial and recreational - by denying any permits or other authorizations for the "Pier 54" - actually the Pier 55, Diller Island - Project in the lower Hudson River. I also strongly oppose using a 15-year-old "Big Permit" for destruction of this irreplaceable nursery habitat for Atlantic Coast fisheries in 490 acres of the Hudson River to approve it.

Approximately 10 percent of the entire East Coast striped bass population is produced in the Hudson River. And this 490 acres of nursery habitat is an important part of the essential overwintering habitat for 35 percent of the Hudson River's striped bass population where they spend the first four years of their life. The striped bass is probably the most important marine species on the United States East Coast both from a recreational and a commercial perspective. Extensive efforts by all the East Coast states from Maine to Florida have gone into producing its recovery from near collapse. Constructing this project at this extremely important location will result in "significant adverse effects" on this entire Hudson River population. It also violates the principles of the Clean Water Act by siting a non-water dependent project in navigable "Waters of the United States" when feasible, land-based alternatives exist. Moreover, this estuarine habitat is also important for the survival of over 100 valuable species, including endangered species, as well as many other commercially and recreationally important coastal marine species. Siting this non-water-dependent project in the River instead of on higher, dryer, safer upland locations would also put people and property in the path of deadly storms (as we have recently seen), and could set ruinous precedents for the misuse of navigable public waterways nationwide. Unless the Corps decides to deny any authorization for the Pier 55/Diller Island project - as the Clean Water Act requires - I request that the Corps hold a public hearing on PN NAN-1998-00290.

Sincerely,

James R. Chambers
Founder/Owner